Federal Defenders

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MEMO ENDOR

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

June 2, 2020

BY ECF

Honorable Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

RE:

United States v. Angel Figueroa

19 CR. 292 (LAK)

Dear Judge Kaplan:

We write in response to the Court's May 28, 2020 Order, directing counsel to indicate how Mr. Figueroa wishes to proceed with his sentencing hearing. Mr. Figueroa would like to proceed with his sentencing hearing in the early fall when there is a greater likelihood that he can participate in person. Furthermore, we request that the Court schedule a deadline for any supplemental sentencing submissions two weeks before the sentencing hearing.

Respectfully submitted,

/s/

Zawadi Baharanyi Annalisa Miron Peggy Cross-Goldenberg Assistant Federal Defenders 212-417-8735(o)/917-612-2753(c)

cc: AUSA Elizabeth Espinosa (by ECF)

USDI

6/3/2020